REMARKS

Applicants reply to the Office Action mailed on August 5, 2010 within three months. Claims 1-12, 14, 15 and 17-27 are pending in the application and the Examiner rejects claims 1-12, 14, 15 and 17-27. Support for the amendments may be found in the originally-filed specification, claims, and figures. No new matter is entered with these amendments. Applicants respectfully request reconsideration of this application.

Rejections under 35 U.S.C § 103

The Examiner rejects claims 1-12 and 14-27 under 35 U.S.C. § 103(a), as being unpatentable over Chu taken with Konda et al, U.S. Publication No. 2003/0041095 ("Konda"). The Examiner rejects claim 26 under 35 U.S.C. § 103(a), as being unpatentable over Chu taken with Konda in further view of Boden et al., US Patent No. 6,061,733 ("Boden"). Applicants respectfully disagree with these rejections, but Applicants present claim amendments in order to clarify the patentable aspects of the claims and to expedite prosecution.

Examiner Interview

Applicants thank the Examiner for the telephone interview conducted with Applicants' counsel on October 6, 2010. During the interview, Applicants discussed distinctions between the primary reference Chu et al, U.S. Publication No. 2002/0049853 ("Chu") and the claims. Specifically, the Examiner reads page, 1, para. 0014 of Chu as disclosing the limitation "determine, based upon the outcome of a first service for a first file, a second service for the first file..." (Office Action, p. 2). However, Applicants do not read Chu as disclosing or contemplating this limitation (which is recited, e.g, in independent claim 1).

The cited passage discloses a system that enables "a method of transferring a file from a first client to a second client" that includes a first client, a server and a second client. "**The first client issues first instructions** for registering an account with the digital asset distribution (DAD) server via the website for transferring a file to the destination address of the second client and the first client includes a web browser for accessing the website. **The first client issues second instructions for uploading the file to the DAD server** via the DAD website and upon the first client initially accessing the website, embedded client software stored on the DAD server operational for a client to upload the file is **automatically downloaded to the first client**

[first service determined]. The first client uploads the file to the DAD server. The system also includes notifying means for notifying the second client that the file is available for downloading from the DAD server. The **second client issues third instructions to the DAD** server via the DAD website for downloading the file, where the second client includes a web browser for accessing the DAD website, and the second client downloads the file." Para. 0014, emphases added. **Thus, the server (DAD) never determines a second service much less a determination of a second service based upon a first service. The first client merely issues two sets of instructions.**

As stated in the interview, the originally filed specification discloses the term "service" as distinguishable from simply "receiving instructions." See, e.g., originally filed specification,

> Examples of tracking information may include the outcome of a workflow task. More specifically, once a file services workflow task begins, significant events are noted along with data and statistics related to these events. These workflow events are maintained in a tracking repository for internal and external, business and technical constituents with varying roles and access rights to view. Manager attempts to ensure that the parameters are sent to the necessary File Services System 5 components upon receipt of data, and in time for execution. Receipt of data generally refers to the bulk package (i.e., file) of business data upon which a File Service System 5 component is to perform a service. The parameters may refer to the service parameters, which service to perform and necessary information to perform the service. Para. 0022; see also para. 0023 and 0026 (emphasis added).

Although Applicants believe that the claims are allowable over the cited references in their current form, in order to expedite prosecution, Applicants amend the independent claims to include the element,

> ... wherein said outcome comprises workflow task information comprising at least one of an event, data related to said event and statistics related to said event, a service parameter associated with said second service and information to perform said second service, and wherein said second service comprises at least one of reformatting, transforming, validating and enriching data associated with said first file....

Applicants thank the Examiner for agreeing that, if the specification supports an interpretation of service that is distinguishable over Chu's disclosure of "first instructions"

and "second instructions," that the claims would be allowable over the cited references. As such, Applicants submit that the amendments to the independent claims, supported by the cited specification language, render the claims allowable over the cited references.

The Office Action also cites *Konda*. *Konda* generally discloses a data transformation system. In the *Konda* system, clients initiate requests to transform data from one format to another. *Konda*, Abstract. The *Konda* system also includes transformation servers "adapted to initiate a plurality of the data converters corresponding to the selected intermediate and final data transformations, in order to obtain the data in the second data format."

Significantly, none of the cited references disclose a workflow system that determines (based upon a multitude of configuration factors and based upon the outcome of a previously executed service) a next service to apply to a file that is being routed, transferred or otherwise manipulated by the system. As such, neither *Chu* nor *Konda* disclose or contemplate at least,

> determine, **based upon the outcome of a first service for a first file, a second service for the first file,** said messaging infrastructure component not providing an entry point for a user into said system, wherein the outcome comprises workflow task information comprising at least one of an event, data related to the event and statistics related to the event, a service parameter associated with the second service and information necessary to perform the second service, and **wherein the second service comprises at least one of reformatting, transforming, validating and enriching data associated with the first file;**

as recited in independent claim 1 (emphasis added) and as similarly recited in independent claims 12 and 27. Applicants therefore respectfully submit that independent claims 1, 12 and 27 are allowable over the cited references.

Dependent claims 2-11, 14-15 and 17-26 variously depend from independent claims 1 and 12, so dependent claims 2-11, 14-15 and 17-26 are allowable over the cited references for the reasons set forth above, in addition to their own unique features.

In view of the above remarks, Applicants respectfully submit that all pending claims properly set forth that Applicants regard as their invention and are allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject application. The Commissioner is authorized to charge any fees due to Deposit Account No. 19-2814.

Respectfully submitted,

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